

National Aeronautics and
Space Administration
John F. Kennedy Space Center
Kennedy Space Center, FL 32899



June 12, 2009

Reply to Attn of: CC-A

TO: Distribution

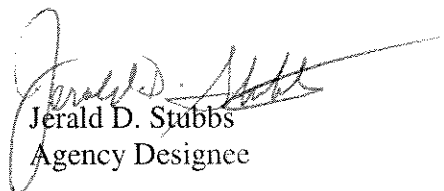
FROM: CC/Chief Counsel

SUBJECT: Attendance at the STS-127 Pre-Launch Cocktail Reception Sponsored by the EDC, Space Florida, ATK, Boeing, Honeywell, Lockheed Martin, Pratt Whitney Rocketdyne, SAIC, and USA

On June 12, 2009, the Economic Development Commission of Florida's Space Coast, Space Florida, ATK, The Boeing Company, Honeywell, Lockheed Martin, Pratt Whitney Rocketdyne, SAIC, and United Space Alliance will host a pre-launch cocktail reception in anticipation of the STS-127 launch. The event will be held at the Doubletree Hotel in Cocoa Beach, from 6:30 pm to 7:30 pm. Approximately 60 guests are expected to attend. These guests include a wide range of representatives that include space industry leaders, NASA senior management, state and local elected officials, Congressional Representatives and Hill staffers, and NASA employees. The approximate value of the reception is \$33 per person.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event. This event will allow NASA employees to discuss the NASA Vision for Space Exploration, the Space Shuttle program, JAXA, and the STS-127 mission with the other attendees. In addition, this event is a forum for the attendees to disseminate information on NASA's ongoing activities and to discuss matters of interest to NASA with a diverse group.

Accordingly, NASA employees whose duties do not substantially affect any of the sponsors may accept an invitation for complimentary attendance at the event. NASA employees whose duties may substantially affect any of the sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from the Chief Counsel's Office. Moreover, NASA employees who are in non-career positions in which the President's Executive Order of January 21, 2009, requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the reception.


Jerald D. Stubbs
Agency Designee

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STDL-A